

network personnel to perform the physical work and to update the customer records in the relevant provisioning and maintenance databases, service orders must be generated.

Interrogatory No. 12.

Consistent with Instruction No. 2, describe in detail the difference in the steps BellSouth must take (including, but not limited to, labor, materials, and computer programming or database verification/updates) in order to update or rollover DS1 or DS3 facilities to a competitive access provider and those BellSouth must take to upgrade or rollover DS1 or DS3 facilities through a BellSouth service, such as LightGate or SMARTRING.

Answer No. 12:

Assuming the same serving wire center and distant end-user location are maintained, and the same facilities are already in place, with the same customer of record, there are no differences in the steps described above.

Interrogatory No. 13.

Consistent with Instruction No. 2, identify all TSLRIC or any other type incremental cost studies that BellSouth has filed with any state public utility commission detailing the nonrecurring costs incurred by BellSouth in accommodating an ACTL Move by an existing BellSouth customer that reconfigures as DS1 or DS3 access facility with a competitive access provider and/or with BellSouth, including all work papers associated with such cost studies. Provide the information requested by this interrogatory with respect to all cost studies prepared on or after October 1, 1994, and all cost studies prepared prior to that date that were not superseded by other cost studies prepared prior to October 1, 1994.

Answer No. 13:

Objection. Relevance. BellSouth objects to answering this Interrogatory on the grounds that its intrastate services are not relevant to this proceeding.

Interrogatory No. 14.

(a) Describe in detail what BellSouth means by the following phrase used in its response to ACSI's Interrogatory No. 2:² "the 'First' circuit in a group of circuits for the same customer to be reconfigured ('First' circuit), (b) in order to provide specific illustrations of what is meant by the 'First' circuit, identify the 'First' circuit when a customer seeks to reconfigure (i) one

² See, e.g., p. 6 (second para.); p. 8 (first full para.); p. 10 (first para.), p. 12 (second para.).

switched DS3 circuit, (ii) five switched DS3 circuits, (iii) one special access DS1 circuit, or (v) five special access DS1 circuits.

Answer No. 14(a):

"First" and "Additional" as those terms are used by BellSouth in its response to ACSI's first set of interrogatories have the following meanings:

"First" is the first circuit on a service order when multiple circuits are provisioned between the same two locations. Example: 24 circuits to one end user at the same location = One (1) First + 23 "Additional". "Additional" only applies if all circuits are on the same service order and are provisioned to the same location for the same customer. Example: 24 circuits to 24 different end user locations = 24 "First" Circuits. A service order can contain up to 28 circuits.

The terms "First" and "Additional" as labeled in Columns A and B of the cost study worksheets [attached to BellSouth's Answer to the First Set of Interrogatories] relates directly to the Per Customer Request and Per Channel Reconfigured [Columns F and G]. The costs produced by multiplying the work time in Column A by the Labor Cost in Column C is reflected in Column D. The same methodology is utilized for Columns B X C = E. The cost of a circuit [labeled Additional in Column E] is subtracted from Column D which produces only the Per Request charge. Therefore, the additional circuit charge reflects the single circuit charge and applies to each additional circuit reconfigured.

Answer No. 14(b):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point,

ACSI has propounded 31 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

Assume that all circuits are for the same customer and are provisioned to the same location.

	Per Request	DS3 Circuit	DS1 Circuits	DS0 Circuit
(i)	One Switched DS3 Circuit:			
	1	1 1 First	28 1 First 27 Additional 28 Ckts/S.O.	672 28 First 644 Additional 24 Ckts/S.O.
(ii)	Five Switched DS3 Circuits:			
	1	5 1 First 4 Additional 5 Ckts/S.O.	140 5 First 135 Additional 28 Ckts/S.O.	3360 140 First 3220 Additional 24 Ckts/S.O.
(iii)	One Special Access DS1 Circuit (Non-channelized)			
	1		1 1 First	
(iv)	Five Special Access DS1 Circuit (Non-channelized)			
	1		5 1 First 4 Additional 5 Ckts/S.O.	

Interrogatory No. 15.

With respect to the cost study provided by BellSouth in conjunction with its answer to ACSI's Interrogatory No. 2(d) provide a detailed description of the work performed that is described in column (A) of Workpaper 2, page 1-3 of 3; and columns (B) of Workpaper 2, pages 2-3 of 3; and columns (B) of Workpaper 4, pages 1-3 of 3. As part of the description, explain why the different groups performing work as part of the reconfiguration are required to do more or less as a function of minutes depending upon the circuit being reconfigured. Be specific as to the differences, e.g., explain why the Circuit Provisioning Center spends 15.2 minutes per additional switched access DS1 circuit reconfigured but spends only 3.75 minutes per switched DS0 circuit reconfigured.

Answer No. 15(a):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 32 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

The following details the work performed that is described in column (A) of workpaper 2, page 1 of 3:

The ICSC receives an ASR from the customer for reconfiguration. The ICSC is responsible for correcting and screening all data inputs on the ASR and for making any manual inputs to the ASR. The screening process involves verification of CABS records and cross-reference of TIRKS® System records. All billing information is updated to assure proper billing. The ICSC then creates a service order for each circuit and distributes the reconfiguration service orders to the Circuit Provisioning Center (CPC) work group. These service orders drive the physical work performed by Network personnel, the update of the Network operational support systems, and the update of the CABS records. The following accounts for the worktime expended by the ICSC:

Column (A)

Analyze, verify CABS
& TIRKS®; review
for accuracy; writes
service order

13.0 minutes

Adds circuit to the
service order/line
side - per circuit

6.0 minutes

Adds circuit to the
service order/trunk
side - per circuit

6.0 minutes

The CPC receives each service order via internal operational support systems. The CPC has different provisioning times for the different types of services that are offered due to differences in the way the circuit is logged into the internal operational support systems, the way the circuit is ordered on the service order to satisfy billing requirements, and the differences in the physical design parameters of the circuit. All records are updated and the order is disbursed to the Special Services Coordination, Tracking and Testing Center (SSCTTC) and the Switching Control Center (SCC). Assistance is provided, as required, by CPC to field forces who perform the work to resolve any additional order discrepancies. The following accounts for the worktime expended by the CPC:

Column (A)

Review ASR and log order

10.0 minutes

Line assignment and
translations preparation

2.75 minutes

DSO design mechanized
via internal operational
support system

2.0 minutes

Total/line side

4.75 minutes

Trunk assignment
and translations
preparation

1.75 minutes

DSO design mechanized
via internal operational
support system

2.0 minutes

Total/trunk side

3.75 minutes

The SSCTTC performs the overall control function for switched access service. The SSCTTC receives and analyzes the request for accuracy, tracks the orders and posts the completion. The following accounts for the worktime expended by SSCTTC:

Column (A)

Analyze, verify, review
for accuracy

13.5 minutes

Track order and post
completion

2.5 minutes

Total

15.0 minutes

The SCC is responsible for performing the necessary central office connections and testing for switched access services. They are notified of the reconfiguration request via the service order from CPC. They access the existing database and verify that existing records match the reconfiguration order and update the record(s) as required. SCC verifies spare equipment and facilities, completes the circuit update and close-out the order. The following accounts for the worktime expended by SCC:

Column (A)

Access existing database

2.0 minutes

Verify equipment and
facility spare

3.0 minutes

Complete circuit update,
close out order

3.0 minutes

Total

8.0 minutes

The term "Initial Billing Comptrollers Clerical" is descriptive of a clerk in the Comptrollers Department that initiates billing. The following accounts for the worktime expended by the clerk:

Column (A)

Billing initiated, per circuit

0.36 minute

Answer No. 15(b):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 33 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

The following details the work performed that is described in column (B) of workpaper 2, pages 2-3 of 3:

After the ICSC has received an ASR from the customer for reconfiguration for a group of DS1 or DS3 circuits that are of the same type and to the same customer location and has completed the screening process for the first circuit of that group of circuits, the ICSC then completes the screening of the additional circuits in that group of circuits utilizing information obtained from the first circuit screening. All billing information is updated to assure proper billing.

The ICSC then adds the additional circuits to the service order and distributes the reconfiguration service order request to the CPC work group. The following accounts for the worktime expended by the ICSC:

Column (B)

Adds additional circuits to the service order, per circuit	6.0 minutes
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The IFCPC receives the order and reviews the internal operational support system database for the first circuit, checking for available interoffice facilities and equipment. The IFCPC completes the same process for the additional circuits on the order, then changes the reconfigured DS3 records to reflect the current interoffice facilities and equipment. The following accounts for the worktime expended by the IFCPC:

Column (B)

Update existing DS3 Records	5.0 minutes
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The CPC receives each service order via internal operational support systems. The CPC has different provisioning times for the different types of service that are offered due to differences in the way the circuit is logged into the internal operation support systems, the way the circuit is ordered on the service order to satisfy billing requirements, and the differences in the physical design parameters of the circuit. All CPC worktimes under the "First" circuit include the logging of the entire order into the internal operational support system (limited to 28 DS1s or 24 DSOs per order), the preparation of all the circuits on the service order for design, and the design of the first circuit on the Circuit Details Screen. All CPC worktimes under the "Additional"

circuit only include the work per circuit on the circuit details screen. The following accounts for the worktime expended by the CPC:

Non-channelized DS3 and DS1 - Special Access Service Circuits

Column (B)

Hicap design - 19 minutes x 80% Request for Manual Assistance (RMA) rate	15.2 minutes
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Channelized DS3 and DS1 - Special Access Service Circuits

Column (B)

Hicap design - 19 minutes x 80% RMA rate	15.2 minutes
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The CPC distributes work documents to downstream internal operational support systems for all of the circuits affected by the customer reconfiguration. The downstream systems use the service order and work document to schedule and coordinate the work associated with the customer reconfiguration and manually logs the order(s) for work scheduling purposes. The SSCTTC and the SCC coordinate the work. CPC provides assistance to field forces who perform the work to resolve any service order, assignment, or work document discrepancies.

The SSCTTC receives and analyzes the request for the first circuit then utilizes that information to verify the additional circuits, then tracks the order and posts the completion. The following accounts for the worktime expended by SSCTTC:

Column (B)

Analyze, verify, review for accuracy	13.5 minutes
Track order and post completion	<u>2.5 minutes</u>
Total	15.0 minutes

Network Terminal Equipment Center/Network Terminal Equipment Location

("NTEC/NTEL") is responsible for performing the necessary central office connections and testing for special access services. They are notified of the reconfiguration request via the service order from CPC. After accessing the existing circuit record database and verifying that existing records match the reconfiguration order and updating the record as required for the first circuit on the order, NTEL completes verification of the additional circuits. NTEL verifies spare equipment and facilities, complete the circuit updates and closes out the order. The following accounts for the worktime expended by NTEC/NTEL:

Column (B)

Access existing database	2.0 minutes
Verify equipment and facility spare	3.0 minutes
Complete circuit update, close out order	<u>3.0 minutes</u>
Total	8.0 minutes

The term "Initial Billing Comptrollers Clerical" is descriptive of a clerk in the Comptrollers Department that initiates billing. The following accounts for the worktime expended by the clerk:

	<u>Column (B)</u>
Billing, initiated, per circuit	0.36 minutes

Answer No. 15(c):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point ACSI has propounded 34 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

The following details the work performed that is described in column (B) of workpaper 4, pages 1-3 of 3:

After the ICSC has received an ASR from the customer for reconfiguration for a group of DS1 circuits that are of the same type and to the same customer location and has completed the screening process for the first circuit of that group of circuits, the ICSC then completes the screening of the additional circuits in that group of circuits utilizing information obtained from the first circuit screening. All billing information is updated to assure proper billing. The ICSC then adds the additional circuits to the service order and distributes the reconfiguration service order request to the CPC work group.

Column (B)

Adds additional circuits
to the service order, per circuit 6.0 minutes

After the CPC receives the service order request and manually log the first circuit of that group of circuits on the order into the internal operational support system for scheduling purposes, the CPC completes reviewing facilities for the additional circuits, all records are updated and the order is disbursed to IFCPC, SSCTTC and the NTEL. Assistance is provided, as required, by CPC to field forces who perform the work to resolve any additional order discrepancies.

Non-channelized DS3 and DS1 - Special Access Service Circuits

Column (B)

Hicap design -
19 minutes x 80%
Request for Manual
Assistance (RMA)
rate 15.2 minutes

Special Access DSO/DDAS Services Circuits

Column (B)

Circuit design -
25 minutes x 80%
RMA rate 2.5 minutes

The SSCTTC receives and analyzes the request for accuracy for the first circuit then utilizes that information to verify the additional circuits, then tracks the order and posts the completion. The following accounts for the worktime expended by the SSCTTC:

<u>Column (B)</u>	
Analyze, verify, review for accuracy	13.5 minutes
Track order and post completion	2.5 minutes
Total	15.0 minutes

NTEC/NTEL is responsible for performing the necessary central office connections and testing for special access services. They are notified of the reconfiguration request via the service order from CPC. After accessing the existing circuit record database and verifying that existing records match the reconfiguration order and updates the record as required for the first circuit on the order, NTEL completes verification of the additional circuits. NTEL verifies spare equipment and facilities, complete the circuit updates and closes out the order. The following accounts for the worktime expended by NTEL/NTEL:

<u>Column (B)</u>	
Access existing database	2.0 minutes
Verify equipment and facility spare	3.0 minutes
Complete circuit update, close out order	<u>3.0 minutes</u>
Total	8.0 minutes

The term "Initial Billing Comptrollers Clerical" is descriptive of a clerk in the Comptrollers Department that initiates billing. The following accounts for the worktime expended by the clerk:

	<u>Column (B)</u>
Billing initiated, per circuit	0.36 minute

Answer No. 15(d):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 35 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

The recorded worktime for CPC for a DSO additional circuit is 3.75 minutes for switched access and 2.50 minutes for special access. The additional recorded worktime for the same center for a DS1 circuit for both switched and special access is 15.20 minutes. The worktime recorded for DS1 includes channelization, where as DSO's are non-channelized circuits. Channelized DS1's require a header assignment record created in TIRKS®. When the study was completed for the most recent filing, there was not any mechanization for carrier design in CPC for DS1 circuits, where as DSO worktime included mechanization.

Interrogatory No. 16.

For every rate decrease or increase that has occurred since January 1, 1992 in the reconfiguration and non-recurring charges of the type that are currently set forth in Sections 6.8.8(J) and 7.5.17 of BellSouth's Tariff F.C.C. No. 1, explain in detail how BellSouth's costs changed so as to justify changes in the rates. With respect to each rate change, be specific as to what work group within BellSouth experienced a cost savings or increase and why.

Answer No. 16:

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 36 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

The initial special access tariff filing establishing reconfiguration non-recurring charges was filed on October 18, 1993. The filing was made in compliance with the Commission's Second Memorandum Opinion and Order on Reconsideration in CC Docket No. 91-141 released September 2, 1993. This tariff filing became effective on February 14, 1994. Only one subsequent tariff filing has been made to revise the non-recurring charges associated with reconfiguration of special access circuits. The filing was made on February 24, 1995 and became effective March 31, 1995. A comparison of these two filings is as follows:

	1994 Rates	1995 Rates (Current Rates)
Voice Grade Reconfiguration	\$23.00	\$33.00
Per Customer Request	\$79.00	\$23.00

DS1 Reconfiguration

Per Customer Request	\$41.00	\$52.00
Per Channel Reconfigured	\$64.00	\$33.00

DDAS Reconfiguration

Per Customer Request	\$23.00	\$33.00
Per Channel Reconfigured	\$78.00	\$23.00

Upon review of the initial filing after it became effective, BellSouth took the opportunity to standardize procedures and develop additional mechanized processes for reconfiguration. This has resulted in an overall lower cost to the company to perform such reconfigurations.

Due to standardization of procedures and the development of additional mechanized processes when receiving and processing a request for reconfiguration, the ICSC work time changed considerably and a slight increase in the Cost Per Request resulted. This increase is offset by a significant reduction in the Cost Per channel for special access Voice Grade, DDAS, and DS1.

The initial switched access tariff filing which established reconfiguration non-recurring charges was filed on November 18, 1993 in compliance with the Commission's Second Memorandum Opinion and Order on Reconsideration in CC Docket No. 91-141 released September 2, 1993. The tariff went into effect on February 15, 1994. Only one subsequent tariff filing has been made to revise the non-recurring charges associated with reconfiguration of switched access circuits. The filing was made on February 24, 1995 and became effective March 31, 1995. A comparison of the rates associated with each filing is as follows:

	1994 Rates	1995 Rates (Current Rates)
Per Customer Request for		
Voice Grade Reconfiguration	\$46.00	\$16.00
Per Line side Service (FGA)	\$19.00	\$19.00
Per Trunk Side Service	\$19.00	\$13.00
Per Customer Request for DS1		
Reconfiguration	\$41.00	\$52.00
Per DS1 Circuit reconfigured	\$64.00	\$33.00
Per Customer Request for DS3		
Reconfiguration	\$41.00	\$52.00
Per DS3 Circuit Reconfigured	\$69.00	\$37.00

Since the initial filing became effective in February, 1994, BellSouth took the opportunity to standardize procedures for reconfigurations and to develop additional mechanical processes which resulted in an overall lower cost to the Company to perform reconfigurations.

For Voice Grade - Service Order Processing, the ICSC Customer Representative work time minutes were reduced which resulted in a cost savings. In addition, the Special Services Center (SSC) and Comptrollers clerical functions were eliminated from the Service Order Processing. The trunk side service associated with voice grade reconfigurations. The Special Services Center function was eliminated which resulted in cost savings.

For DS1 and DS3 Switched Access Reconfigurations, the Per Customer Request rate now includes costs for the ICSC Customer Representative. For the per DS1 and DS3 circuits reconfigured, the ICSC Customer Representative work time minutes have been reduced thus reducing the overall cost.

Interrogatory No. 17.

Provide a detailed definition of what BellSouth means by using the term "incremental costs" in its answers to ACSI's Interrogatory No. 2, subparts (a) and (b).

Answer No. 17:

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 37 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

Incremental Costs are the difference in costs over the long run between two alternative courses of action. Such costs are forward looking. They estimate the incremental investment and expenses which would be incurred by reason of furnishing additional quantities of a service or a reduction in quantities of a service. Long run incremental costs do not account for fixed or underlying costs of providing service on the network, and do not take into account joint costs of facilities and equipment shared with other services nor would they take into account common costs of the business as a whole.

Interrogatory No. 18.

Provide a detailed definition of the term "total weighted work time" as used in BellSouth's cost study provided with its response to ACSI's Interrogatory No. 2(d) (e.g., Workpaper 2, page 2 of 3, heading to column (A)).

Answer No. 18:

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 38 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

The term "Total Weighted Work Time" is defined as the total amount of time in minutes required by each work group to provision a particular cost element, factored by the probability of that work group having to perform that work function. For this study the probability of occurrence is 100%.

Interrogatory No. 19.

Explain in detail why the work group identified in the cost study attached to BellSouth's Answer to ACSI's Interrogatory No. 2(d) are able to perform their work in less time for additional circuits (e.g., on pages 2 and 3 of Workpaper 2, explain why, for each line, is column (B) smaller than in column (A)) than for "First" circuits.

Answer No. 19:

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories

to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 39 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

See BellSouth's Answers to Interrogatories No. 14, 15 & 16.

Interrogatory No. 20.

Identify those states in which BellSouth has or at any time after October 1, 1994, had an intrastate analog of the Network Optimization Waiver Program contained in §7.4.20 of BellSouth's Tariff F.C.C. No. 1. Consistent with Instruction No. 2, in those States where BellSouth has or had such a program, describe the TSLRIC (or incremental costs of TSLRIC are not available) incurred by BellSouth in accommodating reconfigurations of a DS1 or DS3 access facility by grooming such facility or rolling it over onto BellSouth's LightGate or SMARTRING services (or analogous intrastate services) pursuant to the intrastate program. Identify all documents that refer to or relate to such TSLRIC (or incremental costs if TSLRIC are not available), including, but not limited to, cost studies and associated workpapers.

Answer No. 20:

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. ACSI has at this point propounded 40 interrogatories (including subparts) through its First and Second Interrogatories. BellSouth further objects on relevancy grounds. BellSouth objects to answering this Interrogatory on the grounds that it seeks information that is not relevant to the resolution of this formal complaint to the extent that it seeks information pertaining to BellSouth's intrastate services.

Interrogatory No. 21.

Consistent with Instruction No. 2 and with respect to BellSouth's answer to ACSI's Interrogatory No. 4, identify any factors, other than the number and capacity involved, that affect BellSouth's calculation or assessment of non-recurring charges for different customers reconfiguring a DS1 or DS3 facility. Identify all tariff provisions and documents that refer to or relate to those factors. Answer this Interrogatory for the period October 1, 1994 through the present.

Answer No. 21(a):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 41 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

(a) **For Switched Access DS1 and/or DS3**

The factors which could contribute to different non-recurring charges assessed to different customers for the reconfiguration of a switched access DS1 and/or DS3 facility are as follows:

- (1) Pursuant to the BellSouth Tariff F.C.C. No. 1 Section 2.3.10, Switched Access Services must have a Percent Interstate Usage (PIU) factor applied to each service upon installation. This PIU will determine this amount of revenue of non-recurring charges to be allocated to both the interstate and intrastate jurisdictions. When the PIU factor is applied to reconfigurations of the facility (DS1 and/or DS3 facilities) and then each subsequent trunk or line (DS0), the non-recurring charges will vary

with the application of regulations and level of the rates, if the PIU factor is less than 100%.

- (2) Pursuant to the BellSouth F.C.C. No. 1 Tariff, if the customer of record changes for the DS1 and/or DS3 facility (e.g., one carrier transfers use and ownership of facility and trunks/lines to another Carrier), non-recurring charges would apply for the Transfer of Service contract on a per circuit basis. This is a one-time charge to set up a new billing account number for the facility/trunks/lines to be reconfigured.
 - This contract must be issued prior to the reconfiguration request orders. If this procedure does not take place initially, the customer could be charged installation charges for the service as the service would look 'new' to BellSouth.
- (3) Additionally, if any switched access services are sharing or "riding" on special access facilities, the PIU of the Switched Access Service must be considered when reconfiguring the special access facilities.

All of the above circumstances could create differences in the non-recurring reconfiguration charges assessed to individual customers. These factors must be considered on each customer request for reconfigurations to a competitive access provider as well as reconfigurations to other BellSouth services.

Answer No. 21(b):

Objection. ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories

to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. At this point, ACSI has propounded 42 interrogatories (including subparts) through its First and Second Interrogatories. Notwithstanding the foregoing objection, and without waiving same, BellSouth answers as follows:

(b) For Special Access DS1 and/or DS3

Factor affecting the calculation or assessment of non-recurring charges for different customers reconfiguring a DS1 or DS3 facility:

- (1) Pursuant to the BellSouth F.C.C. No. 1 Tariff, if the customer of record changes for the DS1 and/or DS3 facility (e.g., one carrier transfers use and ownership of facility to another Carrier), non-recurring charges would apply for the Transfer of Service contract on a per circuit basis. This is a one-time charge to set up a new billing account number for the facilities to be reconfigured.
 - This contract must be issued prior to the reconfiguration request orders. If this procedure does not take place initially, the customer could be charged installation charges for the service as the service would look 'new' to BellSouth.
- (2) Additionally, if any switched access services are sharing or "riding" on special access facilities, the PIU of the Switched Access Service must be considered when reconfiguring the special access facilities.

* * *

The following individuals were responsible for preparing and providing information for the foregoing answers.

No.

10

Amanda Grant, Mgr., Regulatory Policy & Planning (RP&P");

Ann Haymons, Mgr., RP&P; Debbie Marionneaux, Manager, ICSC

11 Grant, Haymons, Marionneaux

12 Grant, Haymons, Brian Blanchard, Mgr., CPC

13 Grant, Haymons, Gay Dilz, Mgr., Interconnection

14 Grant, Haymons, Blanchard, Charles Scott, Mgr., Economic Analysis

15 Grant, Haymons, Marionneaux, Blanchard

16 Grant, Haymons, Dilz, Jim Chinik, Mgr., Broadband Business Unit

17 Grant, Haymons, Scott

18 Grant, Haymons, Scott

19 Grant, Haymons, Blanchard

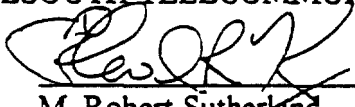
20 Grant, Haymons, Dilz

21 Grant, Haymons, Dilz

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By:


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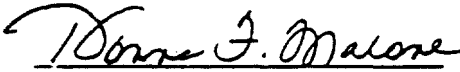
DATE: July 29, 1996

VERIFICATION

Ann W. Haymons, Manager, Regulatory Policy and Planning, BellSouth

Telecommunications, Inc. hereby deposes and says that she has read the foregoing responses; that, the facts set forth therein, subject to inadvertent or undiscovered errors, are based on and necessarily limited by records and information still in existence, presently recollected and thus far discovered in the course of the preparation of these responses; that consequently the right is reserved to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available; that although she does not have personal knowledge of all facts contained in the foregoing answers, such responses are true to the best of her knowledge, information and belief.


Ann Haymons


Subscribed and sworn to before
me this 29th day of July, 1996

Notary Public, Gwinnett County, Georgia
My Commission Expires March 4, 1997